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UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

MARIA MIRANDA-OLIVARES, Plaintiff, vs. CLACKAMAS COUNTY, Defendant.	Case No. 3:12-CV-02317-ST DECLARATION OF MARIA MIRANDA-OLIVARES IN SUPPORT OF MOTION TO STRIKE AND PLACE UNDER SEAL

DECLARATION

I, Maria Miranda-Olivares, declare, under penalty of perjury, that the following statements are true, accurate and correct:

1. I make this declaration in support of the Plaintiff's Motion Strike Portions of and to Place Under Seal Defendant's Filings that Breach Settlement Conference Privilege.
2. On October 1, 2014 I attended a settlement conference in this case. The Honorable Judge John Jeldirks presided over the conference. I attended the conference without an

attorney. At the beginning of the conference Mr. Jeldirks informed me that all statements made by the participants in the conference would be kept confidential. Statements would not be reported or told to others outside of the conference. He also gave us papers which described this confidentiality.

3. That assurance of confidentiality was important to me. Discussion about settlement was difficult for me. My top priority has always been to prevent other people from being incarcerated illegally the way I was. I did not want settlement discussions or settlement itself to undermine that. I was hesitant to let the case be settled for any amount of money out of concern about undermining the effects of the case. Therefore, I did not want preliminary discussions of settlement to be publicized.

4. Moreover, the way that the County has portrayed communications in the settlement conference in its recent court filings is embarrassing to me on a personal level.

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE AND BELIEF AND SUBJECT TO THE PENALTY FOR PERJURY.

DATED this 21 day of August, 2015.

Maria Miranda-Olivares